

UNITED STATES DISTRICT COURT
for the
Western District of Michigan

United States of America)
v.)
JAMES VERNE RUSSELL) Case No.
) 1:19-mj-103
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Summer of 2018 in the county of Muskegon in the
WESTERN District of MICHIGAN, the defendant(s) violated:

Code Section

Offense Description

18 USC 2251(a) and (e)
18 USC 2252A(a)(2) & (b)(1)
18 USC 2252A(a)(5)(B) & (b)(2)

Sexual Exploitation of a Child/Production of Child Pornography
Receipt, transportation, and distribution, and conspiracy to receive, transport,
and distribute, child pornography; and
Possession and access, or attempted access, with intent to view child
pornography

This criminal complaint is based on these facts:

SEE ATTACHED CONTINUATION OF COMPLAINT

Continued on the attached sheet.

Timothy Sim
Complainant's signature

Timothy Simon, Special Agent FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: March 47, 2019

Ellen Scamrody
Judge's signature

Ellen S. Carmody, U.S. Magistrate Judge

Printed name and title